U.S. Department of the Interior
Bureau of Land Management

Determination of NEPA Adequacy (DNA): Healthy Lands Initiative Fuel Breaks Project FY14

DOI-BLM-NV-L030-2014-0023-DNA

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TRACKING NUMBER: DOI-BLM-NV-L030-2014-0023-DNA

PROPOSED ACTION TITLE/TYPE: Healthy Lands Initiative Fuel Break Project FY14

LOCATION/LEGAL DESCRIPTION: Areas adjacent to desert tortoise habitat burned in the 2005 Southern Nevada Complex (see attached Map 1)

APPLICANT (if any):

A. Description of the Proposed Action and any applicable mitigation measures:
The Proposed Action is to utilize two herbicides to treat and reduce the amount of non-native, invasive annual grasses (e.g., *Bromus* spp.) and their seed bank to create fuel breaks on BLM administered land within and adjacent to areas burned in the 2005 Southern Nevada Complex.

The BLM proposes to use approved, commercially available pre-emergent and/or post-emergent herbicides in an effort to reduce invasive annual grasses (i.e., brome grass; red brome (*Bromus rubens*) or cheatgrass (*Bromus tectorum*)) by creating fuel breaks intended to interrupt the annual grass/fire cycle and release existing desirable native plant communities from the competitive pressure of undesirable non-native plant species. Imazapic would be used as a pre-emergent herbicide applied before emergence of invasive annual grasses. In early stages of plant growth (before seed production), Imazapic would be applied in combination with the post-emergent herbicide Glyphosate. A mix of the two herbicides appears to be effective in treating any residual or early growth (with Glyphosate) as well as the pre-emergent component (Imazapic). Additional approved surfactants/adjuvants would be added to these herbicides to aid with adherence and reduce drift. For example, methylated seed oil would be added to improve herbicide action and adherence to the soil or plant. A BLM approved drift inhibitor may be added to the herbicide mixture to produce a more uniform spray pattern of the solution in order to aid in penetration, improve deposition, and retard drift. Again, all label instructions and application rates would be strictly adhered to.

All herbicide treatment standard operating procedures listed in Appendix B of the *Final Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States Programmatic Environmental Impact Statement for Applying Herbicides* (Appendix B), and all label instructions for herbicides and adjuvants would be strictly adhered to. Any spills or discoveries of hazardous or solid wastes would be reported immediately to the approving official.

The proposed action would be to create approximately 45 miles of fuel breaks 40 feet wide on both sides of the road for a total of 436 acres within the burned areas. These fuel breaks would interrupt the annual grass/fire cycle by reducing the connectivity of the fuel bed. The fuel breaks would create a block effect within the watersheds, where if a wildfire did start its overall size would be reduced by containing it within one of these blocks. All of the fuel breaks would be adjacent to existing roads and trails along the predominant upwind side within previously burned

areas. Herbicide would be applied using vehicles with spray equipment by TriCounty Weed in the fall (September to November).

Treatments would occur during the fall/winter season avoiding wildlife sensitive seasonal times, such as migratory bird nesting. These herbicides are for terrestrial use only and would not be applied directly to water or to areas where surface water is present or in washes. No application would occur during windy or gusty conditions or if it is raining or forecasted to rain within 48 hours of application. Label specifications and Appendix B SOPs (Appendix B) would guide aerial, backpack sprayer, herbicide, adjuvant and drift inhibitor usage along with Personal Protective Equipment (PPE), application rate, coverage, mixing methods, droplet size to reduce runoff and drift, and herbicide storage and disposal.

Seeding of appropriate species could occur at appropriate length of time after herbicide treatments to aid in the recovery of desirable and less flammable vegetation composition within the fuel breaks. Seed application would be applied through aerial or ground methods. Aerial methods would involve a helicopter or airplane flying over the treatment area spreading the seed. Ground methods could involve use of an all-terrain-vehicle (ATV) seeder in limited areas. ATV seeding would involve a seeder on the back of the ATV spreading the seed.

In addition to seeding, outplanting of shrubs may enhance restoration efforts. Outplantings would be strategically placed to create fertile islands which may serve as seed sources for larger areas.

Seedling planting would occur around wildlife water developments. This portion of the project would be completed jointly with Nevada Department of Wildlife (NDOW). Implementation and monitoring of this action would be performed by NDOW. NDOW would plant native perennial shrubs at ten small volume water developments of the Kane Springs series (numbers 2 to 8 and 19 to 21). Using these water sources as plot centers, plantings will be made in the previously disturbed area around each water source. Depending on each site's ecological characteristics, approximately 40-60 plants of four to seven species will be planted at each location. Plantings will be watered in the six initial weeks post-planting using a combination of hand hose and Dri-water irrigation. Plantings will be protected with plastic Vexar cones and bamboo stakes and monitored thereafter for Dri-Water re-fill status and plant survival. Vexar will not be removed until seedlings are well enough established to handle browsing pressure from wildlife. Seedling planting around water sources will occur outside wilderness areas.

The fuel breaks would be maintained in future years to ensure they continue to function properly and reduce the continuity of exotic annual grasses. Maintenance of the fuel breaks would be accomplished using techniques very similar to those described here or in the same manner as they were originally implemented. During years of low precipitation, maintenance of the fuel breaks may not be needed.

Mitigation Measures:
All resources potentially eligible to the National Register of Historic Places would be avoided by herbicide application and any other treatments. All design features listed in the Risk Assessment for Noxious and Invasive Weeds will be adhered to.

B. Land Use Plan (LUP) Conformance

LUP Name*: Ely District Resource Management Plan Date Approved: August 20, 2008

The proposed action is in conformance with the Ely District Resource Management Plan (RMP) because it is specifically provided for in the following management actions:

Vegetation Resources

Manage vegetation resources to achieve or maintain resistant and resilient ecological conditions while providing for sustainable multiple uses and options for the future across the landscape.

General Vegetation Management:

Manage vegetation resources to achieve or maintain resistant and resilient ecological conditions while providing for sustainable multiple use and options for the future across the landscape.

VEG-1: Emphasize treatment areas that have the best potential to maintain desired conditions or respond and return to the desired range of conditions and mosaic upon the landscape, using all available current or future tools and techniques.

VEG-4: Design management strategies to achieve plant composition within the desired range of conditions for vegetation communities, and emphasize plant and animal community health at the mid-scale (watershed level).

Watershed

Manage watersheds to achieve and maintain resource functions and conditions required for healthy lands and sustainable uses.

Fire

Return fire to its natural role in the ecological system and implement fuels treatments, where applicable, to aid in returning fire to the ecological system.

Management Actions

***FM-4*:** Incorporate and utilize Fire Regime Condition Class as a major component in fire and fuels management activities. Use Fire Regime Condition Class ratings in conjunction with vegetation objectives (see the discussion on Vegetation Resources) and other resource objectives to determine appropriate response to wildland fires and to help determine where to utilize prescribed fire, wildland fire use, or other non-fire (e.g., mechanical) fuels treatments.

***FM-5*:** In addition to fire, implement mechanical, biological, and chemical treatments along with other tools and techniques to achieve vegetation, fuels, and other resource objectives.

Fish and Wildlife

Provide habitat for wildlife (i.e. forage, water, cover, and space) and fisheries that is of sufficient quality and quantity to support productive and diverse wildlife and fish populations, in a manner consistent with the principles of multi-use management, and to sustain the ecological, economic, and social values necessary for all species.

General Wildlife Habitat Management: Provide habitat for wildlife (i.e. forage, water, cover, and space) and fisheries that is of sufficient quality and quantity to support productive and diverse wildlife and fish populations, in a manner consistent with the principles of multi-use management, and to sustain the ecological, economic, and social values necessary for all species.

WL-1: Emphasize management of priority habitats for priority species.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

1) Ely Proposed Resource Management Plan/Final Environmental Impact Statement (November 2007)
2) Southern Nevada Complex BAER Plan Environmental Assessment (NV-040-05-23)
3) Final Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States Programmatic Environmental Impact Statement for Applying Herbicides
4) Southern Nevada Complex Burned Areas Rehabilitation Project Environmental Assessment (NV-040-05-31)

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Yes ☑ **No** ☐ Documentation of answer and explanation:
The Southern Nevada Complex BAER Plan Environmental Assessment (EA) analyzed the installation of fuel breaks via the application of herbicide in these locations. Not all fuel breaks identified in the EA (which was a total of 113 miles of fuel breaks) would be implemented as part of this proposed action. The proposed action is to implement 45 of the 113 miles identified in the Southern Nevada Complex BAER Plan EA.

The Final Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States Programmatic Environmental Impact Statement for Applying Herbicides analyzed the use of the two herbicides, Imazapic and Glyphosate, proposed to create the fuel breaks.

The Southern Nevada Complex Burned Areas Rehabilitation (BAR) Project EA analyzed seedling planting around wildlife water developments in areas burned by the fires.

The project is within the areas analyzed by the Southern Nevada Complex BAER and BAR Plan EAs.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Yes ☑ **No** ☐ Documentation of answer and explanation:
The proposed action falls within the range of alternatives considered in the EAs, and conditions within the project area have not changed since the EAs were completed.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes ☑ **No** ☐ Documentation of answer and explanation:
Yes, the existing analysis is valid. No new information or circumstances exist that would substantially change the analysis of the proposed action.

The burned areas and the lack of fuel breaks at the landscape level continue to present management challenges. Some of the areas have burned again since the 2005 fires, due to the presence of non-native annual grasses, dry conditions, and an absence of fuel breaks. These fuel breaks did not receive funding in 2005 under Emergency Stabilization and Rehabilitation. Funding is available to implement the project at this time, so the project is being pursued now.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes ☑ **No** ☐ Documentation of answer and explanation:
Yes, the direct, indirect, and cumulative effects that would result from the project are the same as those analyzed in the existing EAs.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes ☑ **No** ☐ Documentation of answer and explanation:

Yes, the existing EAs were developed with public involvement. The EAs went out for public review and a Decision Record/Finding of No Significant Impact for the BAER Plan EA was signed August 12, 2005. A Decision Record/Finding of No Significant Impact for the BAR Project EA was signed March 9, 2006.

Portions of the EAs have already been implemented dependent upon funding availability. This project did not receive initial funding, but currently is funded for implementation.

E. Persons/Agencies /BLM Staff Consulted

Name	Title	Resource/Agency Represented
	BLM Specialists	
Nicholas Pay	Planning and Environmental Coordinator	NEPA
Alicia Styles	Wildlife Biologist	Fish and Wildlife, Special Status Plant and Animal Species, T&E Species
Cameron Boyce	Natural Resource Specialist	Rangelands Standards and Guidelines, Livestock Grazing, Noxious and Invasive Weeds
Harry Konwin	Archaeologist	Cultural Resources
Benjamin Noyes	Wild Horse Specialist	Wild Horses
Ty Chamberlain	Realty Specialist	Lands/Energy
Carissa Shilling	Geologist	Mineral Resources
Kyle Teel	Fire Ecologist	Fuels
Erica Husse	Rehabilitation Manager	Emergency Stabilization and Rehabilitation
Emily Simpson	Wilderness Planner	Special Designations
Randy Johnson	Environmental Protection Specialist	Wastes, Hazardous and Solid, Human Health and Safety
Elvis Wall	Native American Coordinator	Native American Concerns
	NON- BLM Specialists	
Brad Hardenbrook	Sup. Habitat Biologist	Nevada Department of Wildlife

Conclusion (*If you found that one or more of these criteria is not met, you will not be able tocheck this box.)*

☑ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

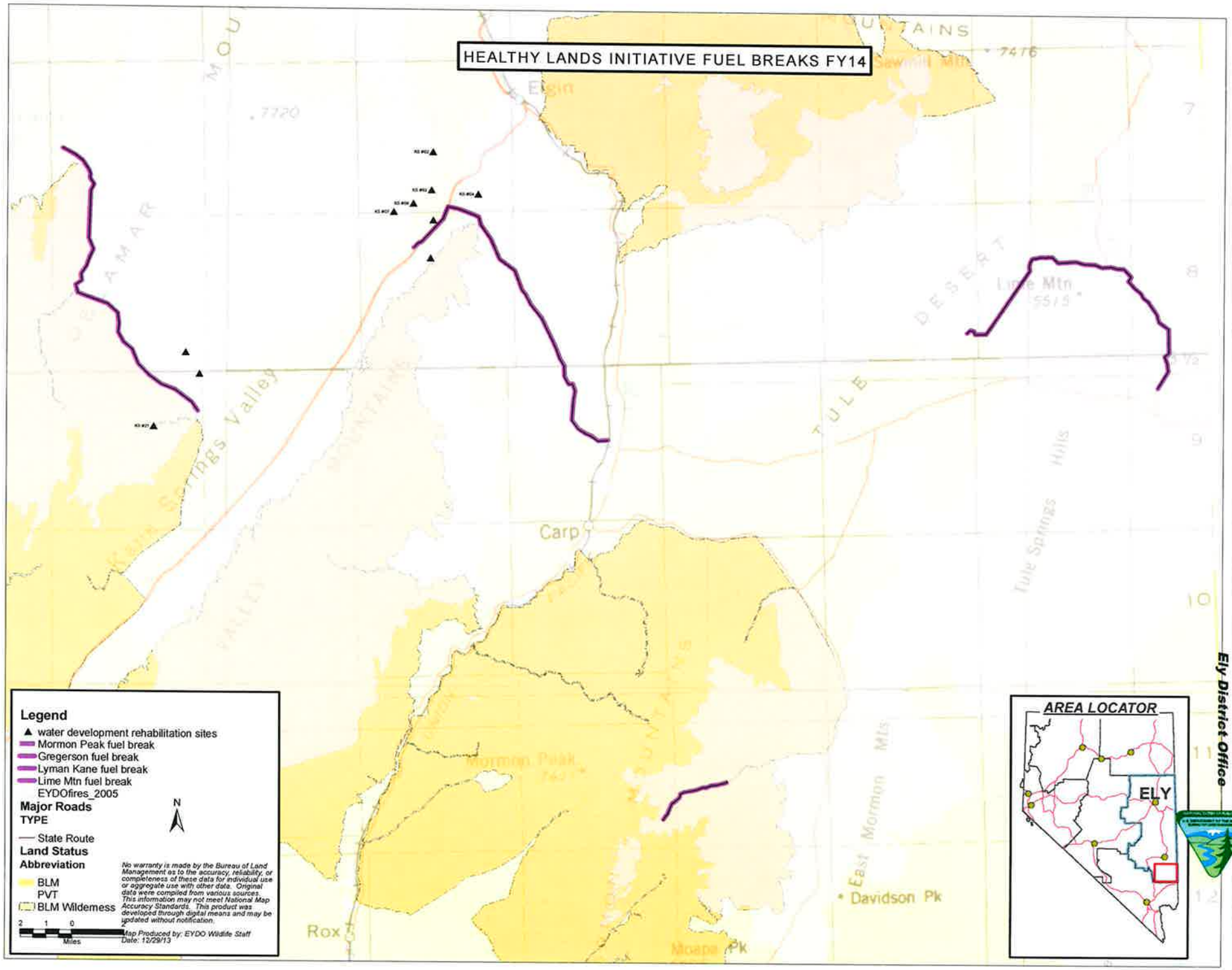
Signature of Project Lead

Signature of NEPA Coordinator

Signature of the Responsible Official: Date 9/16/14

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and and the program-specific regulations.

HEALTHY LANDS INITIATIVE FUEL BREAKS FY14



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